

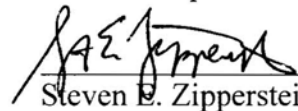
**Report of Management on the Effectiveness of Controls over Compliance with the  
Service Quality Genuity Condition Set Forth in FCC Order Approving the Bell  
Atlantic/GTE Merger**

Management of Verizon is responsible for establishing and maintaining effective internal controls over its compliance with the Federal Communications Commission's ("FCC's") service quality condition concerning certain special access service reports relating to Genuity set forth in paragraph 72 of the FCC order approving the transfer of control of GTE to Bell Atlantic ("Service Quality Genuity Condition"). *In re Application of GTE Corporation and Bell Atlantic Corporation for Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of Submarine Cable Landing License*, CC Docket No. 98-184, Memorandum Opinion and Order (rel. June 16, 2000) ("Merger Order").

Verizon's internal controls have been designed to comply with the Service Quality Genuity Condition. There are inherent limitations in any control, including the possibility of human error and the circumvention or overriding of the controls. Accordingly, even effective controls can provide only reasonable assurance with respect to the achievement of the objectives of controls. Further, because of changes in conditions, the effectiveness of controls may vary over time.

Verizon has determined that the objectives of the internal controls with respect to compliance with the Service Quality Genuity Condition are to provide reasonable, but not absolute, assurance that compliance with the Service Quality Genuity Condition has been achieved.<sup>1</sup>

Verizon has assessed its internal controls over compliance with the Service Quality Genuity Condition. Based on this assessment, the Company asserts, to the best of its knowledge and belief, that for the period January 1 through December 31, 2001 (the "Evaluation Period") its internal controls over compliance with the Service Quality Genuity Condition were effective in providing reasonable assurance that Verizon has complied with the Service Quality Genuity Condition in all material respects.

  
Steven E. Zipperstein

Dated: September 30, 2002<sup>2</sup>

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<sup>1</sup> PricewaterhouseCoopers is separately auditing the accuracy and completeness of performance data for the service quality reports that are the subject of this Report of Management. Accordingly, this Report does not cover accuracy and completeness of such data. The date for PricewaterhouseCoopers' report on accuracy and completeness was extended from June 1, 2002 to October 1, 2002 by the FCC's Enforcement Bureau. See Letter from M. F. Del Duca, Federal Communications Commission, to J. W. Ward, Verizon (May 29, 2002).

<sup>2</sup> The date for the independent accountant's (Mitchell & Titus') report on the Service Quality Genuity Condition was extended from June 1, 2002 to October 1, 2002 by the FCC's Enforcement Bureau. See Letter from M. F. Del Duca, Federal Communications Commission, to J. W. Ward, Verizon (May 29, 2002).